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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

LUCAS BRUNO III, CHRISTOPHER	)	CIVIL NO. 03-00567 JMS BMK
GAHR, RANK ROBERT PAULSON,	)	
CHARLES TURNER, and TOM YOUNG,	)	DEFENDANT'S MOTION FOR SUMMARY
	)	JUDGMENT ON THE CLAIMS OF
Plaintiffs,	)	PLAINTIFF FRANK PAULSON;
	)	MEMORANDUM IN SUPPORT OF
vs.	)	DEFENDANT'S MOTION FOR
	)	SUMMARY JUDGMENT ON THE CLAIMS
MICHAEL CHERTOFF, Secretary,	)	OF PLAINTIFF FRANK PAULSON;
DEPARTMENT OF HOMELAND	)	CERTIFICATE OF SERVICE
SECURITY,	)	
	)	
Defendant.	)	
_____	)	

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT ON THE  
CLAIMS OF PLAINTIFF FRANK PAULSON

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, defendant hereby moves this court to grant it summary judgment on the claims of plaintiff Frank Paulson. The grounds for this motion are set forth in the attached memorandum in support and in the accompanying Concise Statement of Material Facts.

DATED: February 24, 2006, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

/s/ Thomas A. Helper

By \_\_\_\_\_  
THOMAS A. HELPER  
Assistant U. S. Attorney

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

LUCAS BRUNO III, CHRISTOPHER	)	CIVIL NO. 03-00567 JMS BMK
GAHR, RANK ROBERT PAULSON,	)	
CHARLES TURNER, and TOM YOUNG,	)	CERTIFICATE OF SERVICE
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
MICHAEL CHERTOFF, Secretary,	)	
DEPARTMENT OF HOMELAND	)	
SECURITY,	)	
	)	
Defendant.	)	
_____	)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the date and by the method of service noted below, a true and correct copy of the foregoing document was served on the following at their last known address:

**Served by First-Class Mail**

Eve M. Green, Esq.  
Law Office of Eve M. Green  
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**February 24, 2006**

Michael J. Green, Esq.  
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Attorneys for Plaintiffs

DATED: February 24, 2006, at Honolulu, Hawaii.

/s/ Myra Y. Peterson

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